

The University of Cincinnati supports the Joint Comments filed by the National EBS Association (NEBSA) and Catholic Technology Network (CTN). EBS needs to be preserved for education.

There have been so many comments filed in this proceeding by organizations who have successfully deployed EBS in various educational ways for years, that it seems the only hindrance to “highest and best use” of the 2.5 GHz band is the basic fact that the FCC has not accepted a new EBS license application in more than 20 years – in other words, an entire generation has been born and grown to adulthood in unlicensed regions, while eligible entities have waited patiently for their opportunity to obtain an EBS license and serve this population. Therefore, we join with NEBSA, CTN and the other commenters in applauding the Commission for finally beginning the process of releasing additional 2.5 GHz spectrum to the public – and hope that the spectrum will truly be released to the PUBLIC, rather than to private corporations which serve their shareholders first and their local communities as an afterthought.

In today’s world of continually shrinking Federal and State support for education, excess capacity lease agreements such as that between the University of Cincinnati and Sprint help fill the funding gap with essential alternatives which support our educational mission. The lease agreement provides WiFi hot spots and other mobile broadband devices, with service credits, which can be loaned to students who do not have adequate - or any - internet access in their homes. This helps close the so-called Homework Gap or Digital Divide, in line with Commissioner Rosenworcel’s stated goal to “leave no child offline.” (Unfortunately, plans to enhance and expand this initiative for the academic year which has just begun are currently suspended, due to the chilling effect caused by this Notice of Proposed Rulemaking. While we fervently hope that the Commission will do the right thing and reaffirm the importance of preserving EBS for education, the current atmosphere of uncertainty has led to the decision that it would be needlessly cruel to tease our students by providing them with such technology benefits at the outset of the school year, while possible new FCC rules would soon nullify our lease agreement with Sprint, thereby compelling us to recall the devices and shut down the program.)

The University’s lease agreement with Sprint also supplies a reliable revenue stream which pays for technology such as classroom upgrades, equipment that is loaned to students in technical programs, remote connectivity for faculty, staff and administrators, and other instructional resources, as well as salaries of technical support staff.

Regarding the suggestion of incentive auctions for EBS spectrum, such a process would, by its nature, shut out many educational institutions and non-profits, whose fiscal and budgeting processes lack the mechanisms to participate in competitive bidding situations. EBS licensees and the commercial sector have learned how to work together and tailor lease agreements to serve local needs, without the government acting as middle-man for the distribution of funds.

We do support the idea of a priority filing window for Tribal Nations, which in their numerous comments in this proceeding have made clear the need for spectrum to serve their unique geographical areas and populations.

Thank you for taking the time to read and consider these comments.